

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All  
Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**TPP DEFENDANTS' NOTICE OF  
MOTION FOR RULE 37  
SANCTIONS AGAINST MSPRC**

**TPP DEFENDANTS' NOTICE OF MOTION FOR ORDER TO  
SHOW CAUSE WHY MSP RECOVERY CLAIMS, SERIES LLC  
SHOULD NOT BE SANCTIONED FOR VIOLATION OF SMO 73  
AND CMO 32**

**To:** Adam Slater, Esq. (*via ECF, for distribution to Plaintiffs' counsel*)

PLEASE TAKE NOTICE that on a date as soon as June 20, 2023, or as soon thereafter as counsel may be heard, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US Inc., Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC, Solco Healthcare US, LLC, Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., Actavis, LLC, Torrent Pharmaceuticals Ltd., and Torrent Pharma Inc. (collectively, the "TPP Defendants"), by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler and the Honorable Special Master Thomas I. Vanaskie for an order sanctioning Plaintiff

MSP Recovery Claims, Series LLC (“MSPRC”) under Rule 37.

Dated: May 16, 2023

Respectfully Submitted:

By: /s/ Gregory E. Ostfeld  
Victoria Davis Lockard  
GREENBERG TRAURIG, LLP  
Lori G. Cohen  
Victoria Davis Lockard  
Steven M. Harkins  
Terminus 200  
3333 Piedmont Road, N.E.,  
Suite 2500  
Atlanta, Georgia 30305  
(678) 553-2100  
(678) 553-2386 (facsimile)  
CohenL@gtlaw.com  
LockardV@gtlaw.com  
HarkinsS@gtlaw.com

Gregory E. Ostfeld  
77 West Wacker Drive, Suite 3100  
Chicago, Illinois 60601  
Tel: (312) 456-8400  
ostfeldg@gtlaw.com

Liza M. Walsh  
Christine Intromasso Gannon  
Walsh Pizzi O'Reilly Falanga LLP  
Three Gateway Center  
100 Mulberry Street  
15th Floor  
Newark, NJ 07102  
Tel.: (973) 757-1100  
Fax: (973) 757-1090  
lwalsh@walsh.law  
cgannon@walsh.law

*Attorneys for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis Pharma, Inc.,  
and Actavis LLC*

Jessica Davidson (DC Bar No.  
457021) (Admitted to Practice in  
Maryland and the District of  
Columbia; Not Admitted in New  
York)

*Liaison Counsel for Manufacturer  
Defendants*

Allison M. Brown  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
One Manhattan West  
New York, NY 10001  
Telephone: (212) 735-2588  
Facsimile: (917) 777-2588  
jessica.davidson@skadden.com  
allison.brown@skadden.com

SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Nina R. Rose  
1440 New York Ave., N.W.  
Washington, D.C. 20005  
Tel.: (202) 371-7000  
Fax: (202) 661-0525  
nina.rose@skadden.com

*Attorneys for Zhejiang Huahai  
Pharmaceutical Co., Ltd., Huahai  
U.S., Inc., Princeton Pharmaceutical  
Inc., and Solco Healthcare U.S., LLC*

KIRKLAND & ELLIS LLP  
Devora W. Allon  
Alexia R. Brancato  
601 Lexington Avenue

New York, New York 10022  
Tel: (212) 446-5967  
Fax: (212) 446-6460  
Devora.allon@kirkland.com  
Alexia.brancato@kirkland.com  
*Attorneys for Torrent  
Pharmaceuticals Ltd. and Torrent  
Pharma Inc.*